

1 Frank Sommers (State Bar No. 109012)
2 Andrew Schwartz (State Bar No. 100210)
SOMMERS & SCHWARTZ LLP
3 One Embarcadero Center, Suite 800
San Francisco, CA 94111
Telephone: (415) 955-0925
4 Facsimile: (415) 955-0927

5 Maura Prendiville (State Bar No. 257514)
6
LEGAL AID OF MARIN
7 30 N. San Pedro Road, Suite 220
San Rafael, CA 94903
Telephone: (415) 492-0230
Facsimile: (415) 492-0947

9 Attorneys for Plaintiffs Jacquelyn Hall,
10 Ariana Martinez, Karla Fernandez,
Chavon White, and Esther Williams

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JACQUELYN HALL, ARIANA MARTINEZ,
KARLA FERNANDEZ, CHAVON WHITE,
and ESTHER WILLIAMS for themselves and
all others similarly situated.

Plaintiffs,

VS.

19 | HOUSING AUTHORITY OF THE COUNTY
OF MARIN, and DOES 1 through 100,
INCLUSIVE

Defendants

Case No.: C 12-04922 RS

STIPULATION AND [PROPOSED] ORDER
RE ADMINISTRATIVE MOTION TO SEAL
DOCKET NOS. 62, 63, AND 65

Judge: Honorable Richard Seeborg

Date Action Filed: September 20, 2012

Trial Date: Not Yet Rescheduled

1 WHEREAS, Plaintiffs filed their Memorandum of Points and Authorities in Support of the
2 Preliminary Approval of the Settlement (Docket No. 62), their Memorandum of Points and
3 Authorities in Support of the Application for an Award of Attorneys' Fees and Costs (Docket No.
4 63), and Declaration of Frank Sommers in Support of Application for Attorneys' Fees and Costs
5 (Docket No. 65) on May 1, 2014;

6 WHEREAS, Defendant's Counsel transmitted his letter of May 19, 2014, objecting to
7 statements in these motion papers, contending that they violated the mediation privilege and the
8 Settlement Agreement and unduly disparaged Defendant's Counsel, and requesting the replacement
9 of these papers with statements Defendant's Counsel deemed "offending" to be "removed,"

10 WHEREAS, Plaintiffs' Counsel rejects the contentions in Defendant's Counsel's May 19th
11 letter and believes that its initial papers did not violate the Settlement Agreement or the mediation
12 privilege and did not unduly disparage Defendant's Counsel. Plaintiffs' Counsel made changes to
13 many of the sections of the papers that Defendant's Counsel had found "offending" in what it has
14 now served as its Amended Notice of Motion and Motion For Award of Attorneys' Fees and
15 Amended Declaration of Frank F. Sommers, and has agreed to seek an order through an
16 Administrative Motion to Place Docket Nos. 62, 63, and 65 under seal pursuant to Local Rules
17 Section 7-11; and,

18 WHEREAS, as had been previously agreed between the Court and the parties on the recent
19 hearing on Plaintiffs' Motion for Preliminary Approval of the Settlement, Plaintiffs' Amended
20 Notice of Motion and Motion for an Award of Attorneys' Fees and Costs does not identify
21 insurance carriers of the Housing Authority of the County of Marin.

22 ///

23 ///

24 ///

25

26

27

28

1 NOW THEREFORE, Plaintiffs and Defendant stipulate to an order of this Court sealing
2 Docket Nos. 62, 63, and 65, in this matter forthwith. The parties therefore request that the Court
3 approve this Stipulation and authorize the sealing of Docket Nos. 62, 63, and 65 herein.
4

5 IT IS SO STIPULATED.
6

7 DATED: May 29, 2014

SOMMERS & SCHWARTZ LLP

8 /s/ Andrew Schwartz

9 By: Andrew Schwartz, Attorneys for Plaintiffs
10 Jacquelyn Hall, Ariana Martinez, Karla
11 Fernandez, Chavon White, and Esther Williams
12

DATED: May 30, 2014

CHOLAKIAN & ASSOCIATES

14 /s/ Colin Jewell

15 By: Colin Jewell, Attorneys for
16 Defendant Housing Authority of the County of
17 Marin

19 IT IS SO ORDERED.

22 DATED: 6/9/14



21
22
23
24
25
26
27
28

Honorable Richard Seeborg
U.S. DISTRICT COURT